Judge: Hon. Marc L. Barreca
Chapter: 7
Ex Parte

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re: ADAM GROSSMAN, Debtor.	Case No. 10-19817 EX PARTE APPLICATION FOR 2004 ORDER REQUIRING PRODUCTION OF DOCUMENTS FROM ABE WYNER

APPLICATION

RONALD G. BROWN, the Chapter 7 Trustee of the bankruptcy estate of Adam Grossman, by and through his undersigned counsel, applies to this Court for an order requiring Abe Wyner to produce the documents set forth below for examination and copying at the law offices of Wood & Jones, P.S., 303 N. 67th Street, 98103 no later than 5 p.m. on Monday, October 3, 2011. This request is based on an email from the debtor's attorney indicating that he may have borrowed money from Abe Wyner pre or post-petition.

1. Copies of all communications, agreements or any other form of written documentation between the debtor, or anyone acting for his benefit or on his behalf, and Abe Wyner, or anyone acting on his behalf, including but not limited to emails, letters, texts and any other form of communication, written or electronic.

2. Copies of all communications, agreements or any other form of written or electronic documentation between any entity in which the debtor has an interest including, but not limited to, Terrington Davies Tanager Fund LP, Terrington Davies, LLC., Ptarmigan Real Estate Funds, LLC., Terrington Davies Capital Management, LLC,

Wood & Jones, P.S.
303 N. 67th Street
Seattle WA 98103
(206) 623-4382

Adam R.. Grossman & Company, Keywest Financial, LLC., or anyone acting for its benefit or on its behalf, and Abe Wyner, or anyone acting on his behalf.

3. Copies of all documentation in any form evidencing the transfer of funds to or from the debtor, or anyone acting for his benefit or on his behalf, and Abe Wyner, or anyone acting on his behalf.

4. Copies of all documentation in any form evidencing the transfer of funds between any entity in which the debtor has an interest including, but not limited to, Terrington Davies Tanager Fund LP, Terrington Davies, LLC., Ptarmigan Real Estate Funds, LLC., Terrington Davies Capital Management, LLC, Adam R. Grossman & Company, and/or Keywest Financial, LLC., or anyone acting for his benefit or on his behalf, and Abe Wyner or anyone acting on his benefit or behalf.

5. Copies of all documentation in any form evidencing the transfer of real or personal property between the debtor, or anyone acting for his benefit or on his behalf, and Abe Wyner, or anyone acting for his benefit or on his behalf.

6. Copies of all documentation in any form evidencing the transfer of real or personal property or funds between any entity in which the debtor has an interest including, but not limited to, Terrington Davies Tanager Fund LP, Terrington Davies, LLC., Ptarmigan Real Estate Funds, LLC., Terrington Davies Capital Management, LLC, Adam R.. Grossman & Company, and/or Keywest Financial, LLC or anyone acting for his benefit or behalf, and Abe Wyner., or anyone acting for his benefit or behalf.

7. All documentation of any nature evidencing any interest Abe Wyner, or any entity in which he has an interest, in the following real property :

A. 6821 39th Avenue NE, Seattle, WA 98115

B. 1679 Strauss Lane, Redding, California, 96003

C. 773 Metro Way, Redding, CA 96003

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303 N. 67th Street
Seattle WA 98103
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D. 2010 Glenview Drive, Cottonwood, CA

Dated this 19th day of September, 2011.

WOOD & JONES, P.S.

/s/ Denice E. Moewes
Denice E. Moewes, WSBA#19464
Attorney for Chapter 7 Trustee
Ronald G. Brown

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